

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA,)
)
Plaintiff,)
) No.: 4:15-CR-404-HEA-NAB-30
vs.)
)
OSCAR DILLON, III, et al.,)
)
Defendant.)

**DEFENDANTs OSCAR DILLON III AND MICHAEL GRADY'S JOINT
MOTION FOR EXTENSION OF TIME TO FILE POST-TRIAL MOTIONS**

Come now the defendants, Oscar Dillon, III and Michael Grady, by and through their respective attorneys, and respectfully move this Honorable Court to enter an order granting an extension of time within which to file post-trial motions in the above-captioned matter, to May 22, 2021. In support, the following is offered:

1. On April 7, 2021, a jury convicted Mr. Dillon and Mr. Grady of conspiracy to distribute controlled substances, attempted obstruction of justice, and conspiracy to commit money laundering.
2. Post-trial motions are due within 14 days of the verdict. The jury trial in this matter spanned over the court of a two-and-a-half-week period. There were several complex pretrial issues litigated. The attorney for Mr. Dillon and Mr. Grady require more than 14 days to review the record in this case, the transcripts of the trial proceedings, identify relevant issues for post-trial motions, and sufficiently research the necessary legal issues.
3. The undersigned respectfully request 45-days within which to file post-

trial motions. Because the verdict in this matter came down on April 7, 2021, the undersign is requesting that the post-trial motions for both Mr. Dillon and Mr. Grady be due on May 22, 2021.

4. This request is being made in good faith and not for the purposes of delay.

Wherefore, for the reasons stated above, defendants Oscar Dillon III and Michael Grady respectfully request this Honorable Court to enter an order extending the time within which to file their post-trial motions, to May 22, 2021.

Respectfully submitted,

s/ Vadim Glzman
An Attorney for Oscar Dillon, III

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CERTIFICATE OF SERVICE

I hereby certify that on April 8, 2021, a true and correct copy of the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following: all Attorneys of record.

s/ Vadim A. Glzman